

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT

MICHAEL J. FLYNN,

Plaintiff

NO. SUPERIOR COURT DEPARTMENT 54258

DEPARTMENT

April 14 1982

vs.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, INC.,

CHURCH OF SCIENTOLOGY OF
BOSTON, INC.,

KEVIN TIGHE, ROBERT JOHNSON,
and DAVID ADEN,
Defendants

VERIFIED COMPLAINT SEEKING
INJUNCTIVE RELIEF

APR 3 1982

INTRODUCTION

This suit arises out of the unlawful taking of documents taken directly from the inside of the offices of the plaintiff and documents taken from a "dumpster" on the premises or adjacent to plaintiff's offices. The documents at issue were taken from plaintiff without authority by several of the defendants acting in concert and have not been returned.

PARTIES

1. Plaintiff, Michael J. Flynn, is a member of the Massachusetts Bar with offices at 12 Union Wharf, Boston, Massachusetts.
2. Defendant Church of Scientology of Boston, Inc. ("CSB") is a corporation organized and existing under the laws of the Commonwealth of Massachusetts with a principal place of business at 448 Beacon St., Boston, Massachusetts.